

WAD 2917

#7c

9/29/1992



RCRA PERMIT
ADMINISTRATIVE RECORD
ITEM NUMBER

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Reply to
Attn. of: HW-106

SEP 29 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

David A. Aggerholm, Manager
Environmental Management
Port of Seattle
P.O. Box 1209
Seattle, WA. 98111

John Stiller
Project Coordinator
2203 Airport Way South, Suite 400
Burlington Environmental Inc.
Seattle, WA. 98134

Re: RCRA Facility Assessment at the Burlington Environmental
Inc./Port of Seattle Pier 91 Facility
EPA ID No. WAD 00081 2917

Dear Messrs. Aggerholm and Stiller:

This letter is to inform you of a Visual Site Inspection (VSI) to be conducted at the Burlington Environmental Inc./Port of Seattle Pier 91 facility by the U.S. Environmental Protection Agency (EPA). The VSI is a component of the Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA). The RFA is the initial step in the RCRA program's corrective action process. In the RFA, EPA identifies all solid waste management units (SWMUs) at a facility and determines the potential for releases of waste from the units. EPA utilizes the RFA as a mechanism to carry out the corrective action authorities of the Hazardous and Solid Waste Amendments of 1984 (HSWA). Releases of hazardous waste or hazardous constituents to all media (air, soils, and surface and ground waters) from SWMUs are within the jurisdiction of the RCRA corrective action program.

EPA is currently conducting an RFA for the Burlington/Port of Seattle Pier 91 facility. The scope of the RFA includes the Burlington Pier 91 hazardous waste facility and all contiguous property owned by the Port of Seattle. The visual site inspection is planned for October 20-21, 1992. Access to the Pier 91 property including all subleaseors will be necessary for the VSI. You and your subleaseors should be aware that photographic documentation of SWMUs and other areas of concern (AOCs) is routinely performed as part of the VSI.

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The VSI will be performed by PRC Environmental Management, Inc. (PRC). PRC is an authorized contractor of EPA and is acting on behalf of EPA as field investigator. The PRC investigation team may be accompanied by representatives from EPA and the Washington Department of Ecology. Enclosed are an agenda for the VSI, including a preliminary list of SWMUs and areas of concern to be inspected during the VSI (Enclosure 1), and a list of specific information for you to provide to the inspection team (Enclosure 2) at the time of the inspection if possible.

The information in Enclosure 2 is requested in accordance with Section 3007 of RCRA, 42 U.S.C. §6927 which authorizes EPA to request certain information from handlers of hazardous waste. The requested information must be ready for the inspection team at the time of the VSI or within a 30 day time period from the date of this notification letter. Failure to provide the requested information by the allotted time may subject the facility to enforcement action under Section 3008 of RCRA, 42 U.S.C. §6928. Such enforcement action could include the assessment of substantial penalties, up to \$25,000 per day of noncompliance. The facility may assert a claim of confidentiality for any information entitled to protection under 40 CFR, Part 2, Subpart B, by designating the information you believe is entitled to such protection.

We will contact you in the next two weeks to confirm the inspection and make any necessary final arrangements. Please notify all Pier 91 occupants of the VSI schedule.

If you have any questions regarding this letter or the RFA process, please contact David Croxton of my staff at (206) 553-8582.

Sincerely,


for Michael F. Gearheard, Chief
Waste Management Branch

Enclosures(2)

cc: Galen Tritt, Ecology-NW
Cindy Gilder, Ecology
Noushin Arab, PRC

ENCLOSURE 1: PROPOSED VSI SCHEDULE

I. Introductory Meeting

Inspection team will meet with facility personnel to discuss:

- a) Purpose of visit
- b) Agenda
- c) Safety and health considerations
- d) Facility history and operations
- e) Additional information needs pertaining to the SWMUs identified during the preliminary review.

II. Inspection Tour

The inspection team will tour the facility and examine potential SWMUs and Areas of Concern (AOCs), including those listed below. Additional SWMUs and AOCs may be identified during the inspection, based on the team's tour and review of the facility information.

SWMUs and AOCs Previously Identified:

Chempro/Burlington

- 17 SWMUs identified in the draft 1988 Chempro RFA report by Tetra Tech

PANOCO

- Diesel Spill (Converse, 1992) and associated Liquid Hydrocarbon Recovery System
- Storage Tanks

City Ice and Cold Storage Company

- Ammonia Receiver
- Ammonia Spill

Pier 91

- PCB Transformer Concrete Pads
- Underground Storage Tanks D, E, F, G, and N

III. Closing Meeting

The inspection team will meet with facility personnel to conclude the VSI activities.

Pier 91

a) PCB Transformer Pads

- 1) Dates of operation
- 2) Location and size
- 3) History of releases
- 4) Information on any remedial activities conducted.

b) Releases from underground storage tanks D, E, F, G, and N:

- 1) Information on any remedial activities conducted
- 2) Recent soil and groundwater analytical results

City Ice and Cold Storage Company

a) Ammonia Spill: Information on recovery activities performed if any.

b) Ammonia Receiver:

- 1) Construction details and capacity
- 2) Operational status
- 3) Release controls and history of releases

**ENCLOSURE 2: RFA INFORMATION NEEDS
BURLINGTON/PIER 91 FACILITY**

1. Provide a map at a scale of 1"=200' that identifies the location of and property boundaries of all Pier 91 occupants.
2. Provide current and historical aerial photographs of Pier 91.
3. To the extent such records exist, provide copies of applications and permits for disposal of solid wastes within the facility boundary made by Pier 91 occupants.
4. Provide information on the final disposition of the various wastes generated by the PANOCO facility (e.g., waste oil drums).
5. Provide the requested information for the specified SWMU or AOC listed below:

Chempro/Burlington

- a) 1978 Marine Diesel Oil Yard Spill (420,000 gallons): Data on investigation performed to determine whether remedial activities were successful in removing all contaminated soil.

PANOCO

- a) Waste Oil Storage Area associated with Liquid Hydrocarbon Recovery System
 - 1) Construction details
 - 2) Capacity
 - 3) Release controls
 - 4) Inspection/maintenance procedures to assure unit integrity.
- b) PANOCO pipeline diesel spill: Estimate of the quantity of diesel spilled.
- c) Tanks 91-93, 95, 101-104, and 113
 - 1) Construction details
 - 2) Capacity
 - 3) Dates of operation
 - 4) Specific waste types
 - 5) Inspection/maintenance procedures to assure unit integrity.

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